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21 Attorneys for United States of America

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 SAN FRANCISCO DIVISION

25 UNITED STATES OF AMERICA,) CASE NO. CR 18-465 MMC
26 Plaintiff,)
27 v.) STIPULATION REGARDING PROPOSED PRE-
28 UNITED MICROELECTRONICS) TRIAL SCHEDULE AND [PROPOSED] ORDER
29 CORPORATION, INC.; FUJIAN JINHUA)
30 INTEGRATED CIRCUIT, CO., LTD.; CHEN)
31 ZHENGKUN, a.k.a. STEPHEN CHEN; HE)
32 JIANTING, a.k.a. J.T. HO; and WANG)
33 YUNGMING, a.k.a. KENNY WANG.)
34 Defendants.)

35 Pursuant to the Court's order of September 9, 2020 (Dkt No. 131), the United States and
36 defendants Fujian Jinhua Integrated Circuit Co. ("Jinhua") and United Microelectronics Corporation,

1 Inc. ("UMC") jointly propose the following pre-trial schedule for the Court's consideration:

2 Event	3 Date
4 U.S. shall produce all <i>Brady, Giglio, Jencks</i> (excluding grand jury testimony), and Rule 16(a) Materials (except expert disclosures)	5 December 21, 2020
6 Government Expert Disclosures (Rule 16(a)(1)(G))	7 April 2, 2021
7 Dispositive and Discovery Motion Deadline (including all Rule 12(b)(3) Motions). ¹	8 April 23, 2021
8 Briefing and Hearing Schedules on Dispositive and Discovery Motions	9 To be set by Court
9 Defense Expert Disclosures (Rule 16(b)(1)(C))	10 April 30, 2021
10 Government's Disclosure of grand jury testimony of witnesses intended to be called at trial	11 April 30, 2021
11 <i>Reciprocal Discovery from Defendants (pursuant to Rule 16(b)(1)(A), (B))</i>	12 May 14, 2021
12 Government Rebuttal Expert Disclosures	13 May 28, 2021
13 Government Exhibit List/Witness List for case-in-chief	14 May 28, 2021
14 Motions in Limine/ <i>Daubert</i> Motions <ul style="list-style-type: none"> • Oppositions • Replies • Hearing 	15 June 18, 2021 <ul style="list-style-type: none"> • July 2, 2021 • July 9, 2021 • July 13, 2021
15 Defense Exhibit List/Witness List for case-in-chief	16 July 6, 2021
16 Pre-Trial Conference Statement pursuant to L.R. 17.1-1 (as modified by the above) as well as: <ul style="list-style-type: none"> • Joint Factual Stipulations • Proposed Juror Questionnaires • Proposed Voir Dire Questions • Proposed Jury Instructions • Proposed Verdict Forms 	17 July 6, 2021
17 FINAL PRE-TRIAL CONFERENCE	18 July 13, 2021 at 10:00 a.m.
18 TRIAL	19 August 9, 2021 at 9:00 a.m. (Jury Trial — Estimate: 4-8 weeks)

18 SO STIPULATED AND AGREED

20 Dated: September 30, 2020

19 Respectfully Submitted,

21 DAVID L. ANDERSON
22 United States Attorney

23 /s/ Nicholas O. Hunter
24 LAURA VARTAIN HORN
25 Assistant United States Attorneys

26 NICHOLAS O. HUNTER
27 Trial Attorney, National Security Division

28 ¹ All discovery motions based on materials produced to date to be filed by this date.

/s/ Matthew E. Sloan
JACK P. DICANIO
MATTHEW E. SLOAN
Attorney for Defendant
Fujian Jinhua Integrated Circuit Co. Ltd.

/s/ Leslie Caldwell
LESLIE CALDWELL
Attorney for Defendant
United Microelectronics Corp., Inc.

1 [PROPOSED] ORDER
2

3 Based upon the parties' stipulation and for good cause shown, the Court ORDERS that the pre-
4 trial schedule in this case is as follows:

Event	Date
U.S. shall produce all <i>Brady</i> , <i>Giglio</i> , <i>Jencks</i> (excluding grand jury testimony), and Rule 16(a) Materials (except expert disclosures)	December 21, 2020
Government Expert Disclosures (Rule 16(a)(1)(G))	April 2, 2021
Dispositive and Discovery Motion Deadline (including all Rule 12(b)(3) Motions). ¹	April 23, 2021
Briefing and Hearing Schedules on Dispositive and Discovery Motions	To be set by Court
Defense Expert Disclosures (Rule 16(b)(1)(C))	April 30, 2021
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Pre-Trial Conference Statement pursuant to L.R. 17.1-1 (as modified by the above) as well as: <ul style="list-style-type: none"> • Joint Factual Stipulations • Proposed Juror Questionnaires • Proposed Voir Dire Questions • Proposed Jury Instructions • Proposed Verdict Forms 	July 6, 2021
FINAL PRE-TRIAL CONFERENCE	July 13, 2021 at 10:00 a.m.
TRIAL	August 9, 2021 at 9:00 a.m.

21 IT IS SO ORDERED
22

DATED: _____

23 _____
24 HON. MAXINE M. CHESNEY
25 United States District Judge
26
2728 _____
1 All discovery motions based on materials produced to date to be filed by this date.